



**Livestock and Seed Program  
Audit, Review, and Compliance Branch  
Quality System Audit Report**

**AUDIT INFORMATION**

<b>Applicant Name:</b>	OCPP/Pro-Cert Canada, Inc.
<b>Est. Number:</b>	N/A
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<b>Phone Number:</b>	306-382-1299
<b>Auditor(s):</b>	Darrell Wilson
<b>Program:</b>	USDA National Organic Program (NOP)
<b>Audit Date(s):</b>	March 4, 2008
<b>Audit Identifier:</b>	NP7029OOC
<b>Action Required:</b>	No
<b>Audit Type:</b>	Corrective Action Audit
<b>Audit Objective:</b>	To verify that corrective actions adequately address the non-compliances identified during the Surveillance-Accreditation Renewal Audit.
<b>Audit Criteria:</b>	7 CFR Part 205, National Organic Program; Final Rule, dated December 21, 2000, updated September 11, 2006
<b>Audit Scope:</b>	Submitted corrective actions
<b>Location(s) Audited:</b>	Desk

**FINDINGS**

OCPP/Pro-Cert Canada submitted corrective actions on February 28, 2008, which adequately addressed the non-compliances identified during the Accreditation Renewal Audit.

**NP7029OOC.NC1 – Adequately Addressed** – NOP §205.404(b)(3) states, “The certifying agent must issue a certificate of organic operation which specifies the: Categories of organic operation, including crops, wild crops, livestock, or processed products produced by the certified operation.” *During the review of client files, 3 files were found to contain certified categories fallow and plough down. These two items are not consistent with the NOP regulation.* **Corrective Action:** References to “non-crop” land such as fallow, green manure, and plough down will no longer be listed on the Certificate of Conformity.



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**NP7029OOC.NC2 – Adequately Addressed** –NOP §205.501(a) states, “A private or governmental entity accredited as a certifying agent under this subpart must:

- (1) Have sufficient expertise in organic production or handling techniques to fully comply with and implement the terms and conditions of the organic certification program established under the Act and the regulations in this part.” *A review of the resumes for personnel involved with the certification operation indicated that the majority of the resumes do not have enough detailed information to determine whether or not the individual has the necessary qualifications.*  
**Corrective Action:** OCCP/Pro-Cert has developed a generic format for resumes for office staff and inspectors, which have been distributed to all employees to complete. The Quality System Manual, Part I, Section 4.4.1 has been revised outlining the required information needed on resumes and that resumes must be updated at least every 24 months.
- (6) Conduct annual performance evaluation of all persons who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations concerning certification, or make certification decisions and implement measures to correct any deficiencies in certification services.” *There are no performance evaluations for the personnel from the Eastern affiliate.* **Corrective Action:** OCCP/Pro-Cert has revised the Employee Performance Evaluation document and has instructed the Pro-Cert EBO Certification Co-ordinators to conducted performance evaluations of all office staff and contract inspectors employed by Pro-Cert during the period September 1, 2007 to December 31, 2007. These evaluations were being done at the time of the corrective action submission. All EBO and HO co-ordinators were instructed to complete the evaluations in January and each subsequent year at all future times.
- (11)(v) Prevent conflicts of interest by: Requiring all persons who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations concerning certification, or make certification decisions and all parties responsibly connected to the certifying agent to complete an annual conflict of interest of interest disclosure report.” *A review of conflict of interest disclosure reports indicated that only one third of the Eastern affiliate have current conflict of interest disclosure reports.*  
**Corrective Action:** The EBO staff and inspectors were contacted and the conflict of interest disclosure reports were updated. 2008 agreements were being solicited at the time of the corrective action submission.
- (15)(ii) Submit to the Administrator a copy of: A list, on January 2 of each year, including the name, address, and telephone number of each operation granted certification during the preceding year.” *OCCP documentation used for NOP organic certification does not contain a policy or procedure addressing this clause.* **Corrective Action:** OCCP/Pro-Cert has added a section to their Quality System Manual a policy requiring them to submit the required information on or before January 2<sup>nd</sup> of each year.



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**NP7029OOC.NC3 – Adequately Addressed** – NOP §205.510(a) states, “An accredited certifying agent must submit annually to the Administrator, on or before the anniversary date of the issuance of the notification of accreditation, the following reports and fees...” *OCPP documentation used for NOP organic certification does not contain a policy or procedure addressing this clause.* **Corrective Action:** OCCP/Pro-Cert has added to their Quality System Manual a policy requiring the submission of an annual report on or before May 24<sup>th</sup> of each year.

**NP7029OOC.NC4 – Adequately Addressed** – NOP §205.510(b) states, “Certifying agents must maintain records according to the following schedule: (2) Records created by the certifying agent regarding applicants for certification and certified operations must be maintained for not less than 10 years beyond their creation; and (3) Records created or received by the certifying agent pursuant to the accreditation requirements of this subpart F, excluding any records covered by §§205.510(b)(2), must be maintained for not less than 5 years beyond their creation or receipt.” *OCPP documentation for NOP organic certification does not address these two clauses.* **Corrective Action:** Procedure statement in Part II, Section 12.5.2 of the Quality System Manual was revised to read: “All records regarding application for certification under any accreditation program included but not limited to:.....must be retained for at least 10 years beyond the date of creation or receipt.”

**NP7029OOC.NC5 – Adequately Addressed** – OCPP Quality Manual, Section 2.8 requires that all staff and sub-contractors execute the Standard OC/PRO Confidentiality and Conflict of Interest Agreement (Doc. # 2.4.7). *A review of the Confidentiality and Conflict of Interest Agreements indicated that only one third of the Eastern Affiliate has current agreements.* **Corrective Action:** The EBO staff and inspectors were contacted and the conflict of interest disclosure reports were updated. 2008 agreements were being solicited at the time of the corrective action submission.